



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Keyes et al. :
Serial No.: 09/737,628 : Art Unit: 3628
Filed: December 15, 2000 : Examiner: Frantzy Poinvil
For: METHODS AND SYSTEMS :
FOR EFFICIENTLY SAMPLING :
PORTFOLIOS FOR OPTIMAL :
UNDERWRITING :

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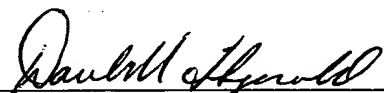
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- Comments on Statement of Reasons For Allowance (2 pages)
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Respectfully submitted,


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COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313

Sir:

The following comments are in response to the Examiner's Statement of Reasons for Allowance included within the Corrected Notice of Allowance dated September 16, 2005.

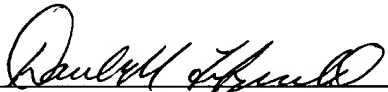
Applicants respectfully disagree with the Examiner's Statement of Reasons for Allowance because such statement may have unintentionally introduced some ambiguities in what was otherwise a very concise and thorough examination of the Claims of this patent application. The Examiner recites in the Reasons for Allowance what he believes is taught by references: Knowles WO 96/06402; and an article entitled "Portfolio Modeling Tool Now Incorporates Detailed Collateral Information". Applicants do not necessarily agree with what the Examiner has recited as to what is taught by these references. Rather, Applicants believe the record as a whole should be considered.

The Examiner further notes in the Reasons for Allowance that "the prior art taken alone or in combination failed to teach or suggest a step of utilizing the computer to determine a number of samples to be submitted for further underwriting, as recited in independent claim 1" and that the "prior art taken alone or in combination failed to teach or suggest a step to determine a number of samples to be submitted for further underwriting review as recited in independent claim 9" and that the "prior art taken alone or in combination failed to teach or suggest a step to determine a number of samples to be submitted for further underwriting review with a computer

for sampling assets in an asset portfolio for optimal underwriting coverage, the computer including a database of asset portfolios and valuation process analytics as recited in independent claim 17". While Applicants believe that the claims are allowable, Applicants do not acquiesce that patentability resides in these features recited in the Reasons for Allowance. Rather, Applicants respectfully submit that the claims are allowable because the independent claims recite the above-noted recitation in combination with other recitations included in the independent claims.

Also, reasons for allowance are only warranted in instances in which the record of the prosecution as a whole does not make clear the Examiner's reasons for allowing a claim or claims (see 37 CFR §1.104(e)). In the present case, Applicants believe the record as a whole does make the reasons for allowance clear and therefore no statement by the Examiner is necessary or warranted.

Respectfully submitted,



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